

DISTRICT ATTORNEY KINGS COUNTY

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> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: DANIELLE DONOGHUE

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 04/26/2013, AGAINST MOS DONOGHUE:

1. DRV-TRAFFIC VIOLATIONS BUREAU - COURT NON-APPEARANCE

ACTION TAKEN: COMMAND DISCIPLINE B ISSUED

CASE CLOSED: 06/24/2013

Disclosure # 2:

MOS POF DONOGHUE IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTIONS:

- DEREK RAYMOND FRANKS V. CITY OF NEW YORK, ET AL., 13-CV-6254 (KAM) (RER), FILED IN THE EASTERN DISTRICT OF NEW YORK
- BRIANNVANDYKE V. CITY OF NEW YORK, ET Al., 150807/2014 FILED IN RICHMOND COUNTY SUPREME COURT

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH FEBRUARY 5, 2021, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez District Attorney Kings County